

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re: Michkel R. Davis and Erika N. Davis
a/k/a Erika N. Jusino,
Debtors.

JPMorgan Chase Bank, National Association,
Movant,

v.

Michkel R. Davis and Erika N. Davis a/k/a
Erika N. Jusino,
Debtors,

Scott Waterman, Trustee,
Additional Respondent.

CHAPTER 13

BANKRUPTCY CASE NUMBER
18-10164/JKF

CERTIFICATION OF DEFAULT

Kevin S. Frankel, Esquire, Attorney for Movant, certifies that Debtors have defaulted upon the terms of this Court's Stipulation and Order dated September 17, 2018. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtors and Debtors' Attorney on December 27, 2018. The Debtors have failed to cure the default as set forth in the Notice. The Debtors have failed to make the following payments:

Regular payments of \$1,552.91 from September 1, 2018 through February 1, 2019	\$9,317.46
TOTAL DEFAULT AS OF FEBRUARY 1, 2019	\$9,317.46

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

Dated: February 1, 2019

S&D File #:18-058755

BY: /s/ Kevin S. Frankel
Kevin S. Frankel, Esquire
Shapiro & DeNardo, LLC
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610)278-6800/ fax (847) 954-4809
PA BAR ID #318323
kfrankel@logs.com
pabk@logs.com